

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

BRADLEY BOISEN,

Defendant.

) Criminal No. 1:21-CR-203(NAM)

) Indictment

) Violations: 18 U.S.C. § 2422(b)
) [Attempted Coercion and
) Enticement of a Minor]

) 18 U.S.C. §§ 1591(a)(1),
) (b)(2) & 1594(a)
) [Attempted Sex Trafficking of
) a Child]

) 2 Counts and Forfeiture Allegations

) County of Offense: Albany

THE GRAND JURY CHARGES:

COUNT 1

[Attempted Coercion and Enticement of a Minor]

On or about April 21, 2021, in Albany County in the Northern District of New York, the defendant, **BRADLEY BOISEN**, using a facility and means of interstate commerce, did knowingly attempt to persuade, induce, and entice an individual who had not attained the age of 18 years, that is: a person whom the defendant believed to be a 14-year-old female child, to engage in sexual activity for which a person could be charged with a criminal offense, that is: offenses under Articles 130 and 230 of the New York State Penal Law, in violation of Title 18, United States Code, Section 2422(b).

COUNT 2
[Attempted Sex Trafficking of a Child]

On or about April 21, 2021, in Albany County in the Northern District of New York, and elsewhere, the defendant, **BRADLEY BOISEN**, in and affecting interstate commerce knowingly attempted to obtain, patronize, and solicit by any means a minor who had attained the age of 14 but had not attained the age of 18, knowing that the minor had not attained the age of 18 and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), and 1594(a).

FIRST FORFEITURE ALLEGATION

The allegations contained in Count One of this indictment are hereby realleged and incorporated by reference herein for the purposes of alleging forfeiture, pursuant to Title 18, United States Code, Section 2428.

Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Sections 2422, as alleged in Count One of the indictment, the defendant, **BRADLEY BOISEN**, shall forfeit to the United States of America his interest in any property, real and personal, that was used and intended to be used to commit and to facilitate the commission of the offense, and any property, real and personal, constituting and derived from any proceeds that the defendant obtained, directly and indirectly, as a result of the offense.

The property to be forfeited includes, but is not limited to, the following: a SAMSUNG GALAXY S20, IMEI: 355984110002322, and an Apple iPhone with IMEI Number 356597081661386.

SECOND FORFEITURE ALLEGATION

The allegations contained in Count Two of this indictment are hereby realleged and

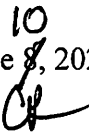
incorporated by reference herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1594.

Pursuant to Title 18, United States Code, Section 1594(d), (e)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1591, set forth in Count Two of this indictment, the defendant, **BRADLEY BOISEN**, shall forfeit to the United States of America:

- a. Any property, real and personal, that was involved in, used, and intended to be used to commit and to facilitate the commission of such violation, and any property traceable to such property; and
- b. Any property, real and personal, constituting and derived from, any proceeds obtained, directly and indirectly, as a result of such violation, and any property traceable to such property.

The property to be forfeited includes, but is not limited to, the following: SAMSUNG GALAXY S20, IMEI: 355984110002322 and an Apple iPhone with IMEI Number 356597081661386.

Dated: June 8, 2021



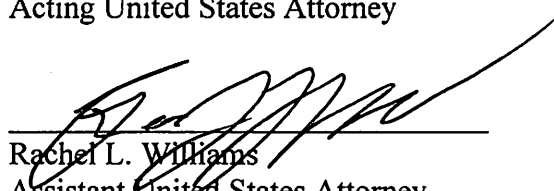
A TRUE BILL, *REDACTION*



Grand Jury Foreperson

ANTOINETTE T. BACON
Acting United States Attorney

By:



Rachel L. Williams
Assistant United States Attorney
Bar Roll No. 701542